

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:

ULTIMATE JETSCARTERS, LLC,

Debtor.

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Chapter 11

Case No. 23-51404

Judge Alan M. Koschik

**MOTION PURSUANT TO LOCAL RULE 2090-1 FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 2090-1, Kimberly Ross Clayson, the undersigned attorney (“Applicant”), respectfully moves this Court for admission *pro hac vice* for the purposes of appearing as counsel on behalf of Byline Bank in the above-captioned case and adversary proceedings arising herein. In support of this Motion, Applicant certifies as follows:

1. Applicant is an attorney at Taft Stettinius & Hollister, LLP, located at 27777 Franklin Rd., Suite 2500, Southfield, Michigan 48034. Her telephone number is (248) 351-3000, facsimile is (248) 351-3082 and email address is [kclayson@taftlaw.com](mailto:kclayson@taftlaw.com).

2. Applicant is an attorney licensed to practice law in the State of Michigan and is a member in good standing of the Bar of the State of Michigan. Applicant has never received disciplinary action and has never been suspended or disbarred in any jurisdiction.

3. Applicant consents to be subject to the disciplinary jurisdiction and rules, ethics and practices that apply to attorneys admitted to practice before the United States District Court for the Northern District of Ohio and the United States Bankruptcy Court for the Northern District of Ohio.

4. Attached as Exhibit A, is Applicant’s Declaration in Support of Motion for Entry of an Order Pursuant to Local Rule 2090-1 for Admission *Pro Hac Vice*.

WHEREFORE, Applicant respectfully requests that the Court (i) enter an order granting her to appear *pro hac vice* as counsel for Byline Bank in this bankruptcy case and adversary proceedings, and (ii) granting such other relief as this Court may deem just.

Dated: November 8, 2023

Respectfully submitted by,

**TAFT STETTINIUS & HOLLISTER,  
LLP**

By: /s/Kimberly Ross Clayson  
Kimberly Ross Clayson (Michigan Bar No.  
P69804)  
27777 Franklin Road, Suite 2500  
Southfield, MI 48034  
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*Counsel to Byline Bank*

**EXHIBIT A**  
**(DECLARATION IN SUPPORT OF MOTION FOR ENTRY OF AN ORDER)**

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:

ULTIMATE JETSHARTERS, LLC,  
  
Debtor.

Chapter 11

Case No. 23-51404

Judge Alan M. Koschik

**DECLARATION IN SUPPORT OF MOTION FOR ENTRY OF AN ORDER PURSUANT  
TO LOCAL RULE 2090-1 FOR ADMISSION *PRO HAC VICE***

I, Kimberly Ross Clayson, under penalty of perjury, make the following declaration in support of the *Motion for the Entry of an Order Pursuant to Local Rule 2090-1 for Admission Pro Hac Vice* (the “Motion”), and declare as follows:

1. I am an attorney at Taft Stettinius & Hollister, LLP, located at 27777 Franklin Rd., Suite 2500, Southfield, Michigan 48034. My telephone number is (248) 351-3000, facsimile is (248) 351-3082 and email address is [kclayson@taftlaw.com](mailto:kclayson@taftlaw.com).

2. I am a licensed to practice law in the State of Michigan and a member in good standing of the Bar of the State of Michigan. I have never received disciplinary action, and have never been suspended or disbarred in any jurisdiction. I understand that, pursuant to Local Bankruptcy Rule 2090-1(b), I am subject to the disciplinary processes of this Court.

3. I am familiar with and will comply with the Bankruptcy Code (11 U.S.C. §§ 101 *et seq.*), the Federal Rules of Bankruptcy Procedure, and this Court’s Local Rules.

4. I respectfully request that this Court enter an order admitting me *pro hac vice* to appear before this Court in all matters pertaining to this case and any related adversary proceeding.

Dated: November 8, 2023

Respectfully submitted by,

**TAFT STETTINIUS & HOLLISTER,  
LLP**

By: /s/Kimberly Ross Clayson

Kimberly Ross Clayson (Michigan Bar No.  
P69804)

27777 Franklin Road, Suite 2500

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*Counsel to Byline Bank*

**CERTIFICATE OF SERVICE**

This is to certify that a true a correct copy of the foregoing was served on the 8<sup>th</sup> day of November 2023 on all parties served by the Court via CM/ECF noticing.

/s/Kimberly Ross Clayson  
Kimberly Ross Clayson

**UNITED STATES BANKRUPTCY COURT  
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**ORDER GRANTING MOTION FOR ADMISSION *PRO HAC VICE***

This matter came before the Court on the *Motion Pursuant to Local Rule 2090-1 for Admission Pro Hac Vice* filed on November 8, 2023 (the “Motion”), for entry of an order, pursuant to Local Rule 2090-1, admitting Kimberly Ross Clayson *pro hac vice* to practice before this Court in the case of the above-captioned debtors. The Court finds that the Motion is well taken, and cause exists supporting approval thereof. Accordingly, it is hereby:

**ORDERED, ADJUDGED AND DECREED that:**

1. The Motion is GRANTED.
2. Kimberly Ross Clayson is hereby admitted *pro hac vice* to appear before this Court in the above-captioned case and any associated adversary proceedings

**IT IS SO ORDERED**

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Submitted by:

By: /s/Kimberly Ross Clayson  
Kimberly Ross Clayson (Michigan Bar No. P69804)  
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*Counsel to Byline Bank*



**Service List**

Getz & Rosen, Ltd., Attorney for Debtor  
(Via ECF)

Peter G. Tsarnas, Attorney for Debtor  
(Via ECF)

Office of U.S. Trustee  
(Via ECF)

Kate Bradley, Attorney for Office of U.S. Trustee  
(Via ECF)

Ultimate Jetcharters, LLC  
6061 West Airport Drive  
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